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May 13, 2009

*Via Electronic Filing*

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**Re: Ex Parte Notice  
WT Docket No. 05-265**

Dear Ms. Dortch:

On May 6, Bob Martin, Linda Martin, and the undersigned, all representing PC Management ("PCM"), met with Paul Murray, Wireless Assistant to Acting Chairman Copps, and discussed matters in the enclosed handout.

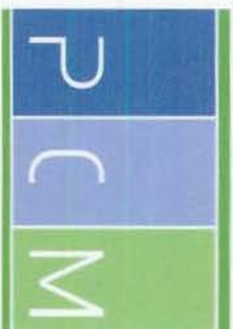
Pursuant to 47 C.F.R. § 1.1206(b)(2), this notice is being submitted electronically in the above-referenced docket. In addition, one copy of this notice is being transmitted via e-mail to Paul Murray.

Very truly yours,

  
Thomas Gutierrez

cc: Paul Murray  
Wireless Assistant to the Chairman

Enclosure



PCMANAGEMENT

## ***Providing and Enabling Wireless and Convergence Services***

**April 30, 2009**

PC MANAGEMENT

## PC Management

- Founded 1990 in Fairfield, NJ to build and operate independent wireless carrier companies serving rural markets in the U.S.
- Structured as a holding company providing senior management, engineering, marketing, back-office and other corporate services to its affiliate carrier companies
- Robert Martin, founder and CEO; Linda Martin, founder and President
- Built, managed, operated and invested in numerous wireless companies
  - Most branded as Cellular One
  - Currently operate Keystone Wireless, LLC d/b/a Immix Wireless

# Keystone Wireless, LLC

- **Keystone Wireless LLC formed in Nov. 2002 to acquire Conestoga Wireless from D & E Communications**
  - Acquired all Assets- Transaction completed in January, 2003
- **Re-branded as Immix Wireless June 2003**
- **Licensed Market Area ~1.0 M pops**
  - Covers 10 counties (6500 sq miles) in central Pennsylvania between the metro areas of Philadelphia, Pittsburgh, Harrisburg, New York and Buffalo

- **5 licensed BTAs (basic trading areas)**

<u>BTA</u>	<u>BTA Name</u>	<u>Spectrum</u>
BTA 360	Pottsville-Frackville	40 MH
BTA 370	Reading	25 MH
BTA 429	State College	40 MHz
BTA 437	Sunbury-Shamokin	40 MHz
BTA 475	Williamsport	40 MHz



there's more in the mix



## Roaming History with AT&T

- PC Management entered roaming agreement w AT&T in 1992
- Latest AA.12 GSM Roaming Agreement with Cingular dated March 14, 2003
- Latest AA.12 GSM Roaming Agreement with AT&T Wireless dated January 31, 2003
- Amendment dated December 1, 2006
  - **AT&T-Cingular merger**
  - **New language provided by AT&T-Cingular under which roaming provided to MVNO clients with the understanding that PCM provides services to MVNOs that roam on AT&T**
  - **Two year Term**

## Roaming Agreement with AT&T

- **Dec, 2006- present:** Roaming services are provided by both parties to each others' wholesale and retail subs with no issues
- **August, 2008:** PCM attempts to renew at the end of the first term
- **August-December, 2008:** after several calls and meetings, AT&T refuses to renew Roaming Agreement with existing terms
- **December 30, 2008:** AT&T sends PCM six month notice of termination effective June 30, 2009
- **March, 2009:** AT&T offers AA.12 that prohibits all MVNO subscribers and limits usage by any subscriber to under 5%
- **Ongoing:** PCM initiates several calls, letters and meetings with AT&T with negative response



## Convergence (FMC) Subscribers Need Access to GSM Roaming

- Convergence MVNOs enable consumers to improve coverage and reduce their total telecom expense by taking advantage of their internet service
  - Leverages and strengthens campus, community and other public-private broadband networks and initiatives
  - As broadband access grows consumers will require FMC
  - Broadband provider (convergence MVNO) provides home or “fixed” service
  - PCM provides FMC technology and controls and directs all calls- first to WiFi or PCM’s GSM network, then to roaming GSM networks
  - Convergence MVNO subscriber roams on AT&T only when no other GSM network available – carrier of last resort